

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE, LLC,)	
)	
Defendant.)	

**NONPARTY WITNESS BRAD BENDER’S MOTION TO QUASH OR IN THE
ALTERNATIVE, FOR PROTECTIVE ORDER**

Nonparty Brad Bender, by counsel, and pursuant to Federal Rules of Civil Procedure 45(d)(3) moves to quash the subpoena for trial witness testimony (“Subpoena”) issued by the United States (“Government”) in the above-captioned proceeding, or in the alternative, moves pursuant to Federal Rule of Civil Procedure 26(c) for a protective order regarding the dates and times of his testimony. The grounds for this motion are set forth in the Memorandum in Support filed herewith.

Dated: August 23, 2024

Respectfully submitted,

/s/ Casey E. Lucier

Amy B. Manning (*pro hac vice pending*)
McGuireWoods LLP
77 West Wacker Drive
Chicago, IL 60601-1818
Telephone: (312) 750-8904
Facsimile: (312) 558-4386
Email: amanning@mcguirewoods.com

Casey E. Lucier (VSB No. 80363)
Juliet B. Clark (VSB No. 96918)
McGuireWoods LLP
800 E. Canal Street
Gateway Plaza
Richmond, VA 23219

Telephone: (804) 775-1000

Email: jbclark@mcguirewoods.com

Email: clucier@mcguirewoods.com

Attorneys for Nonparty Brad Bender

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on August 23, 2024 a copy of the foregoing was electronically filed via the Court's CM/ECF system and served on all counsel of record.

Casey E. Lucier
Casey E. Lucier